

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JESSICA MURCH, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

QUEST HEALTH SOLUTIONS, LLC

AND

HAPPY QUOTE LLC

Defendants.

Case No.

2:24-cv-05478-GAW

NOTICE OF INTENT TO OPPOSE MOTION TO WITHDRAW

Plaintiff respectfully files this Notice of Intent to Oppose Defendant Happy Quote's Motion to Withdraw as Attorney (ECF No. 36). The Plaintiff wishes to observe for the Court that Happy Quote still has outstanding discovery due to Plaintiff, including discovery that seeks critical classwide calling data outlining who all Happy Quote called on Quest Health's behalf with prerecorded messages. If Happy Quote's counsel is permitted to withdraw at this stage prior to production of classwide calling data, which Plaintiff understands is located in Pakistan but subject to Happy Quote's control, such data may be irretrievably lost. Moreover, Happy Quote still has not produced its initial disclosures to Plaintiff, as ordered by the Court. Plaintiff intends to file a full opposition with points and authorities supporting her position within the time provided by the Rules, no later than June 11, 2025.

RESPECTFULLY SUBMITTED AND DATED this May 30, 2025.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.

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CERTIFICATE OF SERVICE

I certify that I filed the foregoing via ECF on the below date.

Dated: May 30, 2025

/s/ Andrew Roman Perrong
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